

THE HONORABLE BARBARA J. ROTHSTEIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

COOPER MOORE and ANDREW GILLETTE, on
their own behalf and on behalf of all others
similarly situated,

Plaintiffs,

v.

ROBINHOOD FINANCIAL LLC, a Delaware
limited liability company,

Defendant.

Case No. 2:21-cv-01571-BJR

**STIPULATED MOTION AND ORDER
EXTENDING DEADLINES**

I. STIPULATED MOTION

1. On January 26, 2023, the Court entered its Order Setting Case Schedule (ECF No. 69), outlining the deadlines for the case through trial.

2. On April 18, 2023, the Court entered an Order granting the parties' stipulated motion for an extension of the deadlines set in the January 26, 2023 scheduling order (ECF No. 74).

3. The parties continue to diligently conduct discovery. Both sides have been working to make document productions, provide supplemental written responses, and conduct discovery with relevant third parties. Robinhood has deposed the two non-parties who sent the allegedly illegal texts to Plaintiffs. Plaintiffs have served a Federal Rule of Civil Procedure 30(b)(6) deposition notice and the parties have been discussing deposition scheduling.

4. The current deadline to complete class certification fact discovery is July 28, 2023. On July 7, 2023, and as Defendant proposed in response to Plaintiffs' data-related Requests for Production, Defendant produced an anonymized data set. Due to the parties'

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negotiations over search terms and other issues related to document collection, Defendant will need additional time to complete its document production with enough remaining time in the case schedule for the parties to complete depositions after all documents are produced, as Plaintiffs have requested. Defendant is currently reviewing email, Drive, and Slack documents that it collected according to search terms the parties agreed upon on May 25, 2023. Defendant believes it can, and will make all reasonable efforts to, produce these documents by August 4, 2023.

5. The parties also are considering private mediation and have agreed to an October 31, 2023 deadline to complete private mediation.

6. The parties believe that minor adjustments to the current case schedule's class certification fact and expert discovery deadlines will allow the parties to expeditiously complete class certification fact discovery without delaying the current class certification briefing schedule or the trial date.

7. Therefore, the parties stipulate and agree to the following proposed extended schedule, subject to the Court's approval:

Event	Current Date	Requested Date
Plaintiffs' expert report(s) served on defendant	August 21, 2023	August 28, 2023
Deadline for class certification fact discovery	July 28, 2023	September 15, 2023
Defendant's expert report(s) served on plaintiffs	September 25, 2023	October 2, 2023
Plaintiffs' rebuttal expert report(s) served on Defendant	November 7, 2023	November 14, 2023
Deadline for the parties to engage in private mediation	n/a	October 31, 2023
Deadline to complete class certification expert discovery	November 21, 2023	December 1, 2023

Deadline for Plaintiffs to file motion for class certification	January 10, 2024	No change
Deadline for Defendant's class certification response	February 7, 2024	No change
Deadline for Plaintiffs' class certification reply	February 28, 2024	No change
Fact discovery cut off	September 23, 2024	No change
Disclosure of expert testimony under FRCP 26(a)(2)	October 25, 2024	No change
Expert discovery cutoff	November 22, 2024	No change
Dispositive motion deadline (including motions regarding experts)	January 24, 2025	No change
Deadline to file proposed pretrial order (including joint pretrial statement), proposed joint <i>voir dire</i> , proposed jury instructions, proposed verdict form, and motions in limine (to be filed in a single, joint brief)	April 2, 2025	No change

Based on the foregoing, the parties respectfully request that the Court grant their motion and extend the case schedule accordingly.

STIPULATED TO AND DATED this 12th day of July, 2023.

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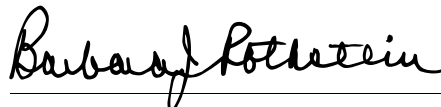
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Attorneys for Plaintiffs

II. ORDER

The Court GRANTS the parties' stipulated motion.

IT IS SO ORDERED on this 12th day of July, 2023.



HONORABLE BARBARA J. ROTHSTEIN
UNITED STATES DISTRICT JUDGE